

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JESSE G. COOPER, in his Personal Capacity  
and as Personal Representative of the Estate of  
PAULA LEE JEFFERSON, *et al.*,

Plaintiffs,

v.

WHATCOM COUNTY, a political subdivision  
of the State of Washington; *et al.*,

Defendants.

NO. 2:20-cv-01196-JCC

**DECLARATION OF RYAN D.  
DREVESKRACHT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PARTIAL SUMMARY JUDGMENT**

I, Ryan D. Dreveskracht, state and declare as follows:

1. I am counsel for Plaintiffs in this suit, over the age of eighteen, and make this declaration based upon personal knowledge and under penalty of perjury under federal law and the laws of the State of Washington.

2. Attached to this Declaration, as **Exhibit 1**, is a true and correct copy of the Whatcom County Incarceration Prevention and Reduction Task Force, Phase III Report, dated December 5, 2017.

3. Attached to this Declaration, as **Exhibit 2**, is a true and correct copy of the St. Joseph Hospital Emergency Department Notes on patient Paula Lee Jefferson, dated from January 27, 2002 to March 30, 2003.

4. Attached to this Declaration, as **Exhibit 3**, is a true and correct copy of a Whatcom County Sherriff's Office Bureau of Corrections Memorandum from Ltd. Caleb Erickson to the

1 Mortality Review Team, with the subject: Summary of the In-Custody Death of Paula Jefferson,  
2 dated June 8, 2018.

3 5. Attached to this Declaration, as **Exhibit 4**, is a true and correct copy of a Peace  
4 Health CE ROI Report on Paula Jefferson, dated December 11, 2013.

5 6. Attached to this Declaration, as **Exhibit 5**, is a true and correct copy of a Peace  
6 Health Release of Information Report on Paula Jefferson, Pages 105 to 112, dated beginning  
7 February 12, 2017.

8 7. Attached to this Declaration, as **Exhibit 6**, is a true and correct copy of a Peace  
9 Health Release of Information Report on Paula Jefferson, Pages 216 to 224, dated beginning  
10 February 20, 2017.

11 8. Attached to this Declaration, as **Exhibit 7**, is a true and correct copy of a Whatcom  
12 County Jail Critical Incident Report on the in-custody death of Paula Jefferson, dated September  
13 11, 2018.

14 9. Attached to this Declaration, as **Exhibit 8**, is a true and correct copy of a Northwest  
15 Regional Council correspondence from Kristine Glasgow to Lieutenant Caleb Erickson, with the  
16 subject: Response to questions regarding 7/18/18 Mortality Review, dated July 23, 2018. Also  
17 attached in the thread is the original Critical Incident Review.

18 10. Attached to this Declaration, as **Exhibit 9**, is a true and correct copy of a Peace  
19 Health CE ROI Report on Paula Jefferson, dated beginning July 12, 2016.

20 11. Attached to this Declaration, as **Exhibit 10**, is a true and correct copy of a Peace  
21 Health CE ROI Report on Paula Jefferson, dated beginning October 13, 2015.

22 12. Attached to this Declaration, as **Exhibit 11**, is a true and correct copy of a Peace  
23 Health Release of Information Report on Paula Jefferson, Pages 2192 to 2197, dated beginning  
24 July 28, 2017.

1           13.     Attached to this Declaration, as **Exhibit 12**, is a true and correct copy of a Peace  
2 Health CE ROI Report on Paula Jefferson, dated beginning November 22, 2013.

3           14.     Attached to this Declaration, as **Exhibit 13**, is a true and correct copy of a Peace  
4 Health CE ROI Report on Paula Jefferson, dated beginning July 12, 2015.

5           15.     Attached to this Declaration, as **Exhibit 14**, is a true and correct copy of a Peace  
6 Health RxPad Medication Profile of Paula Jefferson, dated July 13, 2015.

7           16.     Attached to this Declaration, as **Exhibit 15**, is a true and correct copy of a Peace  
8 Health Release of Information Report on Paula Jefferson, Pages 204 to 209, dated beginning  
9 February 20, 2017.

10          17.     Attached to this Declaration, as **Exhibit 16**, is a true and correct copy of a Peace  
11 Health CE ROI Report Patient Stay Activity on Paula Jefferson, dated beginning July 13, 2015.

12          18.     Attached to this Declaration, as **Exhibit 17**, is a true and correct copy of a Peace  
13 Health CE ROI Report Daily Documentation of Paula Jefferson, dated July 12, 2015.

14          19.     Attached to this Declaration, as **Exhibit 18**, is a true and correct copy of a Peace  
15 Health CE ROI Report Discharge Medication Administration Profile of Paula Jefferson, dated  
16 October 13, 2015.

17          20.     Attached to this Declaration, as **Exhibit 19**, is a true and correct copy of a Peace  
18 Health CE ROI Daily Documentation Report on Paula Jefferson, dated October 25, 2015.

19          21.     Attached to this Declaration, as **Exhibit 20**, is a true and correct copy of a Peace  
20 Health Release of Information Report on Paula Jefferson, Page 132, dated beginning February 9,  
21 2017.

22          22.     Attached to this Declaration, as **Exhibit 21**, is a true and correct copy of a Peace  
23 Health Release of Information Report on Paula Jefferson, Pages 1335 to 1384.

24          23.     Attached to this Declaration, as **Exhibit 22**, is a true and correct copy of a Lummi  
25

1 Nation Police Department DUI report featuring Paula Jefferson, dated August 9, 2017.

2 24. Attached to this Declaration, as **Exhibit 23**, is a true and correct copy of a Lummi  
3 Nation Police Department CAD Report, dated August 11, 2017.

4 25. Attached to this Declaration, as **Exhibit 24**, is a true and correct copy of a  
5 Bellingham Police Department Report detailing video evidence of Paula Jefferson, dated  
6 November 20, 2017.

7 26. Attached to this Declaration, as **Exhibit 25**, is a true and correct copy of a  
8 Bellingham Police Department Report containing a transcript of an interview between Detective  
9 Queen and Miriah Brown, dated August 10, 2017.

10 27. Attached to this Declaration, as **Exhibit 26**, is a true and correct copy of a Peace  
11 Health Release of Information Report on Paula Jefferson, Pages 1769 to 1787, dated beginning  
12 August 9, 2017.

13 28. Attached to this Declaration, as **Exhibit 27**, is a true and correct copy of Jesse G.  
14 Cooper v. Whatcom County, Case No. 20-2-00581-37, Plaintiffs' First Interrogatories and  
15 Requests for Production to Defendant PeaceHealth and Responses Thereto, dated July 6, 2019.

16 29. Attached to this Declaration, as **Exhibit 28**, is a true and correct copy of the  
17 highlighted Deposition of Joshua Farmer in the case Jesse G. Cooper v. Whatcom County, No.  
18 2:20-cv-01196-JCC, dated July 13, 2021.

19 30. Attached to this Declaration, as **Exhibit 29**, is a true and correct copy of the  
20 highlighted Deposition of Jason McDonald in the case Jesse G. Cooper v. Whatcom County, No.  
21 2:20-cv-01196-JCC, dated July 8, 2021.

22 31. Attached to this Declaration, as **Exhibit 30**, is a true and correct copy of a Lummi  
23 Nation Police Department DUI report featuring Paula Jefferson, dated August 9, 2017.

24 32. Attached to this Declaration, as **Exhibit 31**, is a true and correct copy of a  
25

1 highlighted and redacted Bellingham Police Department Report, detailing the in-custody death of  
2 Paula Jefferson, dated August 10, 2017.

3 33. Attached to this Declaration, as **Exhibit 32**, is a true and correct copy of a  
4 highlighted interview transcript from the Bellingham Police Department between Detective Queen  
5 and Deputy Brian Lloyd, dated August 10, 2017.

6 34. Attached to this Declaration, as **Exhibit 33**, is a true and correct copy of the  
7 highlighted Whatcom County Sherriff's Office Inmate Intake Screening form of Paula Jefferson,  
8 dated August 9, 2017.

9 35. Attached to this Declaration, as **Exhibit 34**, is a true and correct copy of a  
10 highlighted Medical Clearance for Jail Form for Paula Jefferson from Peace Health St. Joseph  
11 Medical Center, dated August 10, 2017.

12 36. Attached to this Declaration, as **Exhibit 35**, is a true and correct copy of the  
13 Whatcom County Jail Health Program's Types of Inmates and Housing Assignments Policy.

14 37. Attached to this Declaration, as **Exhibit 36**, is a true and correct copy of the Whatcom  
15 County Sheriff's Office Policy and Procedure Manual Policy 202: Receiving a Prisoner.

16 38. Attached to this Declaration, as **Exhibit 37**, is a true and correct copy of the Whatcom  
17 County Sheriff's Office Policy and Procedure Manual Policy 316: Inmate Classification.

18 39. Attached to this Declaration, as **Exhibit 38**, is a true and correct copy of the Whatcom  
19 County Jail Procedure 202F, Housing Inmates.

20 40. Attached to this Declaration, as **Exhibit 39**, is a true and correct copy of the Northwest  
21 Regional Council's Jail Health Program policy on Patients with Alcohol and Other Drug  
22 Problems/Intoxication and Withdrawal, revised October 2016.

1 41. Attached to this Declaration, as **Exhibit 40**, is a true and correct copy of the Northwest  
2 Regional Council's Jail Health Program policy on Continuity and Coordination of Care During  
3 Incarceration, revised October 2016.

4 42. Attached to this Declaration, as **Exhibit 41**, is a true and correct copy of Whatcom  
5 County Sherriff's Office Jail Events Summary Report, By Date, Time with Comments on Paula  
6 Jefferson, dated August 9, 2017.

7 43. Attached to this Declaration, as **Exhibit 42**, is a true and correct copy of a blank  
8 Whatcom County Jail Urine Drug Screen Flow Sheet.

9 44. Attached to this Declaration, as **Exhibit 43**, is a true and correct copy of the Whatcom  
10 County Jail Health Program's procedure on Seizures.

11 45. Attached to this Declaration, as **Exhibit 44**, is a true and correct copy of security  
12 footage from Whatcom County Jail featuring Paula Jefferson, dated August 9, 2017.

13 46. Attached to this Declaration, as **Exhibit 45**, is a true and correct copy of a highlighted  
14 excerpt of the Deposition of Timothy D. Kiele in the case Jesse G. Cooper v. Whatcom County,  
15 No. 2:20-cv-01196-JCC, dated September 28, 2021.

16 47. Attached to this Declaration, as **Exhibit 46**, is a true and correct copy of a highlighted  
17 excerpt of the highlighted Deposition of Kristine Glasgow in the case Jesse G. Cooper v. Whatcom  
18 County, No. 2:20-cv-01196-JCC, dated October 25, 2021.

19 48. Attached to this Declaration, as **Exhibit 47**, is a true and correct copy of an excerpt of  
20 a highlighted excerpt of the highlighted Deposition of Matthew Turner, in the case Jesse G. Cooper  
21 v. Whatcom County, No. 2:20-cv-01196-JCC, dated October 25, 2021.

22 49. Attached to this Declaration, as **Exhibit 48**, is a true and correct copy of an excerpt of  
23 a Bellingham Police Department Case Report Interview transcript between Detective Queen and  
24 Deputy Matt Turner, dated August 10, 2017.

1           50. Attached to this Declaration, as **Exhibit 49**, is a true and correct copy of an excerpt of  
2 the 2017 Whatcom County Jail Health Services Info Sheet.

3           51. Attached to this Declaration, as **Exhibit 50**, is a true and correct copy of a Whatcom  
4 County Contract Information Sheet with Dr. Stuart Andrews, MD, dated November 17, 2021.

5           52. Attached to this Declaration, as **Exhibit 51**, is a true and correct copy of the Northwest  
6 Regional Council's Policy on Emergency Services, revised October 2016.

7           53. Attached to this Declaration, as **Exhibit 52**, is a true and correct copy of an excerpt of  
8 the highlighted Deposition of Matthew Charroin, in the case Jesse G. Cooper v. Whatcom County,  
9 No. 2:20-cv-01196-JCC, dated July 8, 2021.

10           54. Attached to this Declaration, as **Exhibit 53**, is a true and correct copy of an excerpt of  
11 the highlighted Deposition of Violet Haggith, in the case Jesse G. Cooper v. Whatcom County,  
12 No. 2:20-cv-01196-JCC, dated July 9, 2021.

13           55. Attached to this Declaration, as **Exhibit 54**, is a true and correct copy of a Whatcom  
14 County Jail Screening-Receiving Record of Paula Jefferson, dated August 10, 2008.

15           56. Attached to this Declaration, as **Exhibit 55**, is a true and correct copy of the medical  
16 progress notes on Paula Jefferson beginning August 9, 2017.

17           57. Attached to this Declaration, as **Exhibit 56**, is a true and correct copy of the Whatcom  
18 County Health Withdrawal Assessment Scale Scoring Key of Paula Jefferson, conducted on  
19 August 10, 2017.

20           58. Attached to this Declaration, as **Exhibit 57**, is a true and correct copy of the State of  
21 Washington Board of Nursing's Statement of Charges No. PM 4035 against Sally G. Andrews,  
22 R.N., dated July 22, 1987.

23           59. Attached to this Declaration, as **Exhibit 58**, is a true and correct copy of an excerpt of  
24 the Whatcom County Jail Medication Record of Paula Jefferson, dated August 10, 2017.

60. Attached to this Declaration, as **Exhibit 59**, is a true and correct copy of a Westwood Pharmacy Medication Administration record of Paula Jefferson for August 2017.

61. Attached to this Declaration, as **Exhibit 60**, is a true and correct copy of the Whatcom County Jail's Jail Health Program's Chronic Care and Special Needs Policy.

62. Attached to this Declaration, as **Exhibit 61**, is a true and correct copy of a blank Whatcom County Jail Health Program's Alcohol Withdrawal Assessment form.

63. Attached to this Declaration, as **Exhibit 62**, is a true and correct copy of a highlighted City of Bellingham Police Department Case Report Interview Transcript between Detective Queen and Deputy Jason McDonald, dated August 10, 2017.

64. Attached to this Declaration, as **Exhibit 63**, is a true and correct copy of a City of Bellingham Police Department Case Report Interview Transcript between Detective Queen and Deputy Timothy Kiele, dated August 10, 2017.

65. Attached to this Declaration, as **Exhibit 64**, is a true and correct copy of a City of Bellingham Police Department Case Report Interview Transcript between Detective Queen and Martin Otto, dated August 10, 2017.

66. Attached to this Declaration, as **Exhibit 65**, is a true and correct copy of a Whatcom County Sheriff's Office Jail Incident Report on the Death of Paula Jefferson, from August 2017.

67. Attached to this Declaration, as **Exhibit 66**, is a true and correct copy of a City of Bellingham Police Department Case Report Interview Transcript between Detective Queen and Brittany Nave, dated August 10, 2017.

68. Attached to this Declaration, as **Exhibit 67**, is a true and correct copy of an email thread between Caleb Erickson and jail staff featuring a Mortality Review Summary, dated July 12, 2018.



69. Attached to this Declaration, as **Exhibit 68**, is a true and correct copy of the Whatcom County Sheriff's Office Additional Name Information Form on Paula Jefferson, featuring handwritten notes, dated August 10, 2017.

70. Attached to this Declaration, as **Exhibit 69**, is a true and correct copy of a Report of Autopsy of Paula Jefferson, from the Office of the Medical Examiner in Bellingham Washington, dated August 11, 2017.

71. Attached to this Declaration, as **Exhibit 70**, is a true and correct copy of the Toxicology Test report of Paula Jefferson, conducted by the Washington State Patrol's Toxicology Laboratory, dated November 29, 2017.

72. Attached to this Declaration, as **Exhibit 71**, is a true and correct copy of the Plaintiffs' Expert Witness Disclosure in the above-captioned case, dated December 7, 2021.

73. Attached to this Declaration, as **Exhibit 71**, is a true and correct copy of a photo of Paula Jefferson and her family, the Coopers.

DATED this 22nd day of December 2021.

GALANDA BROADMAN, PLLC

s/Ryan D. Dreveskracht

Ryan D. Dreveskracht, WSBA #42593

**CERTIFICATE OF SERVICE**

I, Wendy Foster, declare as follows:

1. I am now and at all times herein mentioned a legal and permanent resident of the United States and the State of Washington, over the age of eighteen years, not a party to the above-entitled action, and competent to testify as a witness.

2. I am employed with the law firm of Galanda Broadman PLLC, 8606 35<sup>th</sup> Avenue NE, Ste. L1, Seattle, WA 98115.

3. Today I served the foregoing document, via this Court's ECF system, on all Defendants.

The foregoing Statement is made under penalty of perjury and under the laws of the State of Washington and is true and correct.

Signed at Seattle, Washington, this 22nd day of December, 2021.

s/Wendy Foster  
Wendy Foster